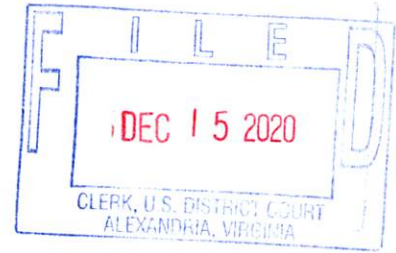


UNITED STATES DISTRICT COURT

for the

FOR THE EASTERN District of VIRGINIA

Division



Karen Yianopoulos
1077 30th St NW #314
Washington, DC 20007

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

The Middle East Broadcasting Network - Alhurra TV
7600 Boston Blvd
Springfield, VA 22153

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

1:20-W-1539-AJT/IDD
(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Karen Yianopoulos
Street Address	1077 30 th St NW #314
City and County	Washington
State and Zip Code	DC 20007
Telephone Number	2028364888
E-mail Address	KarenYianopoulos@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	The Middle East Broadcasting Network -- Alhurra TV
Job or Title (<i>if known</i>)	
Street Address	7600 Boston Blvd
City and County	Springfield
State and Zip Code	VA
Telephone Number	22153
E-mail Address (<i>if known</i>)	

Defendant No. 2

Name	The Middle East Broadcasting Network -- Alhurra TV
Job or Title (<i>if known</i>)	
Street Address	400 N Capitol St NW #775
City and County	Washington
State and Zip Code	DC
Telephone Number	20001
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Telephone Number _____

E-mail Address (if known) _____

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name	The Middle East Broadcasting Network --Alhurra TV
Street Address	7600 Boston Blvd
City and County	Springfield
State and Zip Code	VA 22153
Telephone Number	

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to (check all that apply):

☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

☒ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

☒ Other federal law (specify the federal law):

Jurisdiction and Venue

1. This is an action under the Americans with Disabilities Act (ADA), 42 U.S. Code §§ 12101 et seq.; the Family and Medical Leave Act (FMLA), 29 U.S. Code §§ 2601 et seq., and Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e et seq., seeking damages, equitable and other relief for failure to accommodate, interference with protected rights, discrimination and/or retaliation in employment based on disability (including a record of being disabled and/or perception of disability), sex, religion, national origin, and/or for retaliation for opposing defendant's discriminatory practices and/or seeking rights under the relevant statutes, including but not limited to reasonable accommodation or medical leave.

2. This Court has jurisdiction under 42 U.S.C. §§ 2000e-2 and 2000e-3; 28 U.S.C. §§ 1331, 1343, and 42 U.S.C. § 12117. Venue lies in the District under 42 U.S.C. § 2000e-5(f)(3) and 28 U.S.C. § 1391(b), because the events that gave rise to Plaintiff's claims occurred in this district and the decisions at issue were made in this district.

☐

Relevant state law (*specify, if known*):

☐

Relevant city or county law (*specify, if known*):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (*check all that apply*):

☐

Failure to hire me.

☒

Termination of my employment.

☐

Failure to promote me.

☒

Failure to accommodate my disability.

☐

Unequal terms and conditions of my employment.

☐

Retaliation.

☐

Other acts (*specify*):

(*Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.*)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

July 2019 -- September 2019

C. I believe that defendant(s) (*check one*):

- ☐ is/are still committing these acts against me.
- ☒ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain):*

- ☐ race _____
- ☐ color _____
- ☒ gender/sex _____
- ☐ religion _____
- ☐ national origin _____
- ☐ age *(year of birth)* _____ *(only when asserting a claim of age discrimination.)*
- ☒ disability or perceived disability *(specify disability)*
Breast Cancer diagnosis _____

E. The facts of my case are as follows. Attach additional pages if needed.

After submitting an FMLA form for a breast cancer diagnosis from my Dr Christine Teal, my breast cancer surgeon - requesting time off for medical appointments and ongoing cancer programs and to work from closer work bureau just 4 miles from 100% of of my medical appointments - The Middle East Broadcast Network - Alhurra TV refused to allow to accommodate me. They wanted me to do a roundtrip commute of 80 miles per day.

Aproximately four weeks after submitting my FMLA form I was fired from my job of more than 15 years, despite 100% of excellent/outstanding annual and semi-annual work performance reviews.

Approximately, One month prior to my being fired, the company The Middle East Broadcast Network -- Alhurra TV -- deactivated my work badge and key card that is used to unlock the door to enter the building - so I could no longer enter the building. For each workday one of the security gurads would have to come outside and open the door for me to enter -- this occurred during the time I was still a full-time employee at the Middle East Broadcast Network -- Alhurra TV and after I submitted my FMLA forms.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

07/22/20

- B. The Equal Employment Opportunity Commission *(check one):*

- ☐ has not issued a Notice of Right to Sue letter.

☒ issued a Notice of Right to Sue letter, which I received on (date) 9/23/2020.
 (Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

- ☐ 60 days or more have elapsed.
☐ less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Salary compensation from the day I was fired to date of resolution \$150,000. COBRA payments for 18 months \$15,660 Punative damages of salary resolution \$150,000 as allowed by law for bad behavior causing undue anxiety for a breast cancer diagnosis - while undergoing continued treatments. Out of pocket medical expenses \$10,000. All legal costs encured for this claim.

Plaintiff would like to be rehired to her full-time position and full salary and benefits.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

12/15/20
 December 15, 2020

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Signature of Plaintiff

Printed Name of Plaintiff

Karen Yianopoulos

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Alexander DIVISION

Plaintiff(s),

Karen Yianopoulos

1077 30th St NW #314

Washington, DC 20007

v.

Defendant(s).

The Middle East Broadcast Network – Alhurra TV

7600 Boston Blvd

Springfield, VA 22153

LOCAL RULE 83.1(M) CERTIFICATION I declare under penalty of perjury that: No attorney has prepared, or assisted in the preparation of Pro Se Complaint for Employment

Discrimination _____ (Title of Document)

Karen Yianopoulos _____ Name of Pro Se Party (Print or Type)

Karen Yianopoulos Signature of Pro Se Party

Executed on: Dec 15, 2020 (Date)

OR The following attorney(s) prepared or assisted me in preparation of

_____. (Title of Document) _____ (Name

of Attorney) _____ (Address of Attorney)

_____. (Telephone Number of Attorney) Prepared, or assisted in the

preparation of, this document _____ (Name of Pro Se Party (Print or

Type) _____ Signature of Pro Se Party Executed on:

_____ (Date)